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March 21, 2014

Vía Express Courier and email

The Honorable Shira A. Scheindlin
United States District Court
Southern District of New York
Daniel Patrick Moynihan
500 Pearl Street
New York, New York 10007-1312

As with Trammo, Peerless's request for a 60 day extension to move or answer the complaint is hereby granted. Peerless's motion or answer is due on May 26, 2014. Peerless is invited to join the pre-motion conference scheduled for April 16 at 4:30.

RE: *Commonwealth of Puerto Rico, et al v. Shell Oil Co. et al.*,
1:00-cv-01898, SDNY Index Nos. 14-cv-1014 & 07-cv-10470
Peerless' letter joining Trammo's March 20, 2014 letter requesting
a pre-motion conference and extension of time

SO ORDERED:

Shira A. Scheindlin
USDC
3/25/14

Dear Judge Scheindlin:

On March 20, 2014, Trammo Petroleum, Inc. and Trammo Caribbean, Inc. (collectively "Trammo"), defendants in case no. 1:14-cv-01014 ("the New PR Action"), filed a letter requesting a pre-motion conference prior to filing a motion to dismiss, in accordance with Your Honor's Individual Rule IV(A) and in an effort to avoid incurring unnecessary legal fees in drafting the motion. Pending the conference, Trammo also requested a 60-day extension to either move the Court or file an answer to the complaint against it. This March 20, 2014 letter followed Trammo's unanswered March 10, 2014 letter to the plaintiff in the New PR Action, the Commonwealth of Puerto Rico ("the Commonwealth"), requesting a voluntary dismissal.

On March 21, 2014, this Court entered an Order granting Trammo's request for a pre-motion conference and the extension of 60 days to move the Court or answer the complaint. (Case No. 07-cv-10470, Docket No. 377).

The March 20, 2014 letter now granted by the Court also mentioned Peerless Oil and Chemicals, Inc. ("Peerless") as a similarly-situated codefendant in the New PR Action, who would be joining in Trammo's request for a pre-motion conference through a separate letter to the Court. Peerless asserts that Trammo's statements are true, and is hereby joining in Trammo's March 20, 2014 letter. For the reasons stated therein, Peerless requests a pre-motion conference prior to filing a motion to dismiss, in accordance with Your Honor's Individual Rule IV(A); and, pending the conference, requests a 60-day extension to either move the Court to dismiss the complaint against it or file its answer, currently due on March 27, 2014. If it is convenient for the Court, Peerless is

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available to take part in the pre-motion conference between Trammo and the Commonwealth scheduled for April 16, 2014, and would agree to the date of May 26, 2014 as the set date to either file an answer or a motion to dismiss.

Peerless further states that, as did Trammo, it requested a voluntary dismissal in a March 10, 2014 letter that was never responded to by the Commonwealth.

Respectfully submitted,



Amanda Collazo Maguire

cc. All counsel of record via LNFS
Liaison Counsel (via email)